

EXHIBIT 1

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

EDEN ROGERS and

BRANDY WELCH,

Plaintiffs,

vs.

CASE NO. 6:19-cv-01567-TMC

UNITED STATES DEPARTMENT OF HEALTH
AND HUMAN SERVICES;
ALEX AZAR, in his official capacity as SECRETARY of
the UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
ADMINISTRATION FOR CHILDREN AND FAMILIES;
LYNN JOHNSON, in her official capacity as ASSISTANT
SECRETARY of the ADMINISTRATION FOR CHILDREN AND
FAMILIES;
SCOTT LEKAN, in his official capacity as PRINCIPAL
DEPUTY ASSISTANT SECRETARY of the ADMINISTRATION
FOR CHILDREN AND FAMILIES;
HENRY MCMASTER, in his official capacity as
GOVERNOR of the STATE OF SOUTH CAROLINA;

MICHAEL LEACH, in his official capacity as STATE
DIRECTOR of the SOUTH CAROLINA DEPARTMENT OF SOCIAL
SERVICES,

Defendants.

VIDEOTAPED

DEPOSITION OF: LAUREN COLLINS STAUDT
(APPEARING VIA VIRTUAL ZOOM)

DATE: June 4, 2021

TIME: 9:05 AM

REPORTED BY: TERRI L. BRUSSEAU
(APPEARING VIA VIRTUAL ZOOM)

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8 (Rebecca Schindel)
9

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1 ALSO PRESENT:

2 George Libbares, Concierge Technician
3 (Appearing Via Virtual Zoom)

4 Darin Weaver, Video Technician
5 (Appearing Via Virtual Zoom)

6 (INDEX AT REAR OF TRANSCRIPT)
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1 A. No.

2 Q. What is the highest level of education
3 that you have attained?

4 A. I have a Master's of Education from
5 Winthrop.

6 Q. And what other degrees do you hold?

7 A. BS from Winthrop also in family and
8 child development.

9 Q. In what years did you get those two
10 degrees?

11 A. '80 -- 1984 for the BS and 1985 for the
12 Master's.

13 Q. How long have you been employed by DSS?

14 A. 33 years.

15 Q. What is your current position?

16 A. Program Coordinator 2. It's a
17 supervisor of a group home and child placing agency
18 unit.

19 Q. And how long have you held those
20 positions?

21 A. Since 2006.

22 Q. And what was your job position before
23 this one?

24 A. It was still in the same unit, but it
25 was a Program Coordinator 1, so I did not supervise

1 was marked for identification.)

2 BY MS. SCHINDEL:

3 Q. Okay. What exhibit is that? We'll
4 take a look. I have Exhibit 4. Let me know when
5 you have it.

6 MR. RIDDLE: Coming right now.

7 BY MS. SCHINDEL:

8 Q. Do you have the exhibit?

9 A. Yes.

10 Q. Okay. This is Exhibit 4. It's Bates
11 stamped Miracle Hill -- Miracle_Hill_Subp_002056 to
12 58.

13 Miss Staudt, if you would take a moment
14 to review this. I -- if you don't mind, I'm going
15 to grab headphones because I'm hearing a lot of
16 background noise. I will be back in one second.

17 Have you seen this document before,
18 Miss Staudt?

19 A. I don't -- I can't say that I have.
20 I'm aware of a situation, but I don't remember
21 reading this.

22 Q. Do you recall is this the situation
23 that you are aware of?

24 A. Yes.

25 Q. Did you ever follow up with the

1 complainant about this complaint?

2 A. We -- we looked at their policies as a
3 result of this complaint, but this complaint is
4 about a mentor and not a foster parent applicant.

5 COURT REPORTER: I'm sorry, you said
6 about a mentor and a what?

7 THE WITNESS: Not a foster parent
8 applicant.

9 BY MS. SCHINDEL:

10 Q. As a result of this complaint, you
11 reviewed Miracle Hill's policies, is that what you
12 said?

13 A. Yes.

14 Q. Did you ever discuss this complaint
15 with Miracle Hill?

16 A. Not directly, no.

17 Q. What do you mean when you say not
18 directly?

19 A. Not about a mentor. We did -- Jackie
20 and I had a conversation with their staff.

21 MS. SCHINDEL: Kate, could we please
22 mark Tab 9?

23 (EXHIBIT 5, E-mail dated 11/6/17 to
24 Millicent D. Wolfe from Beth Williams, with
25 attachments, was marked for identification.)

1 Q. And which CPAs did you ask for these
2 policies and procedures from?

3 A. I believe we just used that as an
4 opportunity to -- because a lot of times we didn't
5 get them every year because of, you know, being a
6 large document and we just got their changes. We
7 use that as an opportunity to update our files and
8 we asked all of them to send it.

9 Q. When did you ask all of them?

10 A. Probably around the same time Millicent
11 was asking Miracle Hill.

12 Q. And based on that review, did you
13 determine that any other CPAs in South Carolina
14 were discriminating against prospective foster
15 parents on the basis of religion?

16 A. We did not see any.

17 Q. Are you aware of any complaints against
18 other CPAs alleging discrimination on the basis of
19 religion?

20 A. No.

21 Q. Have you ever thought that other CPAs
22 in South Carolina might be discriminating on the
23 basis of sexual orientation?

24 A. I'm not aware. I have not -- I
25 don't -- I don't know.

1 Q. Have you ever suspected that they might
2 be discriminating on the basis of sexual
3 orientation?

4 A. No.

5 Q. Are you aware of any complaints that
6 other CPAs -- against other CPAs alleging
7 discrimination on the basis of sexual orientation?

8 A. I'm not aware of any.

9 Q. Are you familiar with a CPA called
10 Southeastern Children's Home?

11 A. Yes.

12 Q. Do you oversee their license --
13 supervise their licensure?

14 A. Yeah.

15 Q. Do you monitor their compliance with
16 nondiscrimination policies and requirements?

17 A. We -- we do the same for them as we do
18 others.

19 Q. Have you ever become aware that
20 Southeastern Children's Home discriminates against
21 prospective foster parents on the basis of
22 religion?

23 MR. COLEMAN: Object to the form of the
24 question.

25 THE WITNESS: Well, they don't have any